

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JENIECE ILKOWITZ and ADAM ILKOWITZ,

Plaintiffs,

-against-

MICHAEL DURAND, MARLENE ZARFES
a/k/a MARLENE DURAND, ALAN C. PILLA,
HOULIHAN LAWRENCE, INC. JANE H.
CARMODY, THE JUDICIAL TITLE
INSURANCE AGENCY LLC, and ENCO
HOME INSPECTIONS LLC,

Defendants.

Case No. 17 Civ. 773 (PGG)

ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Scott J. Pashman dated September 13, 2017, and the exhibits thereto, the accompanying memorandum of law, and upon all the pleadings and proceedings heretofore had herein, Defendant, The Judicial Title Insurance Agency LLC (“Judicial Title”), will move this Court, before the Honorable Paul G. Gardephe, United States District Judge, United States District Court, Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, 10007, Courtroom 705, at a date and time to be set by the Court, for an Order, pursuant to Fed. R. Civ. P. 11, imposing sanctions upon Plaintiffs Jeniece Ilkowitz and Adam Ilkowitz and/or their attorney Jean-Claude Mazzola, Esq., of Messner Reeves LLP, in the amount of Judicial Title’s attorneys’ fees and costs incurred following the filing of Plaintiffs’ Complaint in this action on February 1, 2017, including fees and costs for the motion for sanctions.


PLEASE TAKE FURTHER NOTICE that in accordance with Local Civil Rule 6.1(b) of the United States District Court for the Southern District of New York, any opposing affidavits and answering memoranda shall be served within fourteen days after service of the moving papers, and any reply affidavits and memoranda of law shall be served within seven days after service of the answering papers.

PLEASE TAKE FURTHER NOTICE that in accordance with Fed. R. Civ. P. 11(c)(2) and Rule IV(C) of the Individual Rules of Practice of Judge Paul G. Gardephe in Civil Cases (“Bundling Rule”), no papers served in support of or in opposition to the motion for sanctions are to be filed or presented to the Court within 21 days after service of the moving papers, and all motion papers, opposition papers, and reply papers shall be filed only when the entire motion has been briefed.

Dated: New York, New York
September 13, 2017

Respectfully submitted,

ADAM LEITMAN BAILEY, P.C.

By: 
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